

U S WEST, Inc.
1801 California Street, Suite 5100
Denver, Colorado 80202
303 672-2960
Facsimile 303 295-6973

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MAY 24 1999

USWEST

James T. Hannon
Senior Attorney

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

May 24, 1999

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room TW-204B
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 96-128, In the Matter of Implementation of the
Pay Telephone Reclassification and Compensation Provisions of
the Telecommunications Act of 1996

Dear Ms. Roman Salas:

Attached for your information is U S WEST Communications, Inc.'s ex parte filing made today with Ms. Anna M. Gomez, Chief, Network Services Division, Common Carrier Bureau in the above-captioned proceeding. Please associate this ex parte filing with the record in CC Docket No. 96-128. An original and one copy are attached hereto. An additional copy is also included to be stamped and returned to the messenger who has been instructed to wait for it.

Please call me at (303) 672-2860 if you have any questions.

Respectfully,

James T. Hannon

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Re: CC Docket No. 96-128, In the Matter of Implementation of the Pay
Telephone Reclassification and Compensation Provisions of the
Telecommunications Act of 1996

Dear Ms. Gomez:

I have written the Commission on two previous occasions to report on U S WEST's progress in implementing Flex ANI and to review problems that we have encountered during implementation.¹ U S WEST representatives also have met with Commission staff in person to discuss technical obstacles that U S WEST faced in making Flex ANI available on all payphones² served by U S WEST payphone access lines ("PAL").³ I am pleased to report that U S WEST has fully resolved all technical problems and is in full compliance with the Commission's Flex ANI requirements.

As you will recall, U S WEST believed that two problems remained to be resolved before implementation of Flex ANI would be complete. The first was to give non-SS7 offices the ability to screen for Flex ANI (i.e., send Flex ANI digits only to the carriers who requested it) by either making the office SS7 capable or by upgrading the tandem to provide screening for the subtending

¹ See Letter from James T. Hannon to Lawrence Strickling (Dec. 11, 1998); Letter from James T. Hannon to Anna Gomez (Jan. 8, 1999).

² During 1998, U S WEST installed Flex ANI software in more than 1,500 switches serving approximately 170,000 payphones lines.

³ See Letter from BB Nugent to Magalie Roman Salas (Mar. 17, 1999).

offices. In my letter of January 8, 1999, we predicted that this problem would be corrected in all affected tandem switches by May 10, 1999. As it happened, the schedule for implementing the software fix was accelerated in two switches and delayed in one (*i.e.*, the tandem switch serving the Ocean Shores, Washington, end office which only serves 21 payphones). As a result, we were delayed slightly in completing this task -- all necessary software changes were fully implemented by May 14, 1999.

The second problem that U S WEST identified was a problem associated with transmitting Flex ANI on 800-to-POTS calls. When U S WEST representatives met with Commission staff in March, they provided data on the costliness of modifying Flex ANI software to resolve the 800/POTS problem.⁴ Since then, U S WEST has performed further investigations to determine the scope of this problem. In analyzing the affected traffic, U S WEST found that all 800-to-POTS calls that it carries are 800 numbers for which U S WEST itself is the carrier.⁵ For these calls, U S WEST does not rely on Flex ANI to track compensable calls, but instead tracks payphone compensation using ANI lists. Because U S WEST does not utilize Flex ANI, U S WEST's switches are Flex ANI capable on all calls for which the coding digits may be required. As a result, U S WEST will not be modifying Flex ANI software in its switches to accommodate 800-to-POTS calls⁶ and will revise its Payphone Specific Digit tariff⁷ in the near future to remove all costs associated with processing these calls.⁸

With the May 14, 1999 upgrade of the tandem switch serving the Ocean Shores, Washington end office, the tandem screening problem has been fully resolved. At this point, U S WEST is in full compliance with the Commission's Flex ANI requirements. U S WEST has never filed a formal request for a waiver of the Flex ANI requirements and, at this point, U S WEST is pleased to confirm that no such relief is needed.

⁴ U S WEST representatives presented data showing that the monthly costs to payphone service providers would increase by two-and-a-half times if U S WEST determined that it was necessary to modify Flex ANI software in all of its switches to comply with the Commission's requirements.

⁵ In general, IXC's that carry 800-to-POTS calls perform the conversion themselves to avoid revealing the POTS number served. For this reason, the payphone-identifying Flex ANI digits are transmitted to the requesting IXC with those calls as they are on any other subscriber 800 call.

⁶ It should be noted that the number of 800-to-POTS calls from payphones in U S WEST's service area is *de minimis* -- averaging less than one call per phone per month.

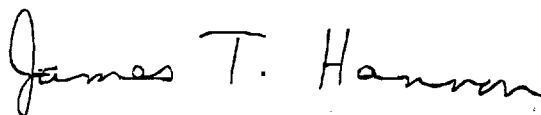
⁷ See U S WEST Communications Tariff FCC No. 5, Transmittal No. 963, Payphone Specific Digit Charge, filed January 15, 1999, effective January 30, 1999.

⁸ This change will reduce the period for recovering Flex ANI costs from 24 to 16 months.

Ms. Anna M. Gomez
May 24, 1999
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I hope that this information is helpful. Please call me at (303) 672-2860 if I can provide any further information or clarification.

Respectfully,

A handwritten signature in cursive script that reads "James T. Hannon". The signature is written in dark ink and is positioned above the printed name.

James T. Hannon

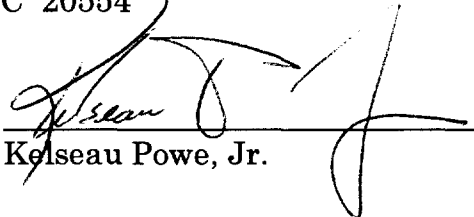
cc: Mr. Marty Schwimmer

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify on this 24th day of May, 1999, that I have caused a copy of the foregoing **EX PARTE** to be hand served on the following persons:

Anna M. Gomez
Federal Communications Commission
Room 6-A324
Portals II
445 12th Street, S.W.
Washington, DC 20554

Marty Schwimmer
Federal Communications Commission
Room 6-A207
Portals II
445 12th Street, S.W.
Washington, DC 20554



Kelseau Powe, Jr.